#### UNITED STATES DISTRICT COURT, EASTERN DISTRICT OF ARKANSAS

#### UNITED STATES OF AMERICA

## MOTION FOR TEMPORARY RELEASE

v

No. 4:05CR00196-01-WRW

# FRANK TURNER

Defendant FRANK TURNER, by appointed counsel, moves for his temporary release and in support thereof states the following:

- 1. On February 16, 2006, the Defendant entered a plea of guilty to Count I of the Indictment (aiding and abetting bank robbery).
  - 2. Sentencing is scheduled for Thursday, June 22, 2006 at 2:30 p.m.
- 3. Defendant requests that he be released from custody to attend the funeral of his grandmother; to wit: Gladys Perkins Weston; Date of death: 05/21/06; Obituary published: 05/24/06 (Exhibit A hereto); Date of funeral: 05/27/06 11-6 p.m. at Greater Macedonia Baptist Church (375-6719), 514 E. 24<sup>th</sup> Street, LR 72206.

WHEREFORE, FRANK TURNER, requests that the Court enter an Order granting his temporary release from custody on May 27, 2006, and for all other just relief to which he may be entitled.

Respectfully submitted,

GILL ELROD RAGON OWEN & SHERMAN, PA 425 West Capitol Avenue, Suite 3801 Little Rock, Arkansas 72201 (501) 376-3800

By: /s/ Drake Mann

Drake Mann, Arkansas Bar number 87108

## CERTIFICATE OF SERVICE

I hereby certify that on May 25, 2006, I electronically filed the foregoing with the Clerk of Court using the CM/ECF system, which shall send notification of such filing to the following:

Linda B. Lipe, Assistant United States Attorney Post Office Box 1229 Little Rock, AR 72201-1229 (501) 340-2600 Linda.Lipe@usdoj.gov

/s/ Drake Mann

Drake Mann, Arkansas Bar N° 87108 Attorney for Defendant GILL ELROD RAGON OWEN & SHERMAN, P.A. 425 West Capitol Avenue, Suite 3801 Little Rock, Arkansas 72201 (501) 376-3800 mann@gill-law.com